

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Middle District of PennsylvaniaCivil Rights DivisionShatasia Chanel Buckner

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Pennsylvania Department of Education, City of Luzerne
Hanover Area School District, Commonwealth of

Pennsylvania
(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 3:24-cv-1494

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ NoFILED
HARRISBURG, PA

SEP 04 2024

PER IBL
DEPUTY CLERK

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Shatasia Chanel Buckner</u>
Street Address	<u>ACP 5826 P.O.Box 1110</u>
City and County	<u>Albany</u>
State and Zip Code	<u>New York 12201</u>
Telephone Number	
E-mail Address	<u>thetruththelightheway8@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Commonwealth of Pennsylvania
 Job or Title (if known) Department of Education
 Street Address 333 Market Street 1st Floor
 City and County Harrisburg
 State and Zip Code Pennsylvania 17126-0333
 Telephone Number
 E-mail Address (if known) ra-stateboardofed@pa.gov

Defendant No. 2

Name Luzerne County Hanover Area School District
 Job or Title (if known) Hanover Area School District
 Street Address 1600 Sans Souci Parkway
 City and County Ashley Luzerne
 State and Zip Code Pennsylvania 18706
 Telephone Number 570-831-2300
 E-mail Address (if known) bmcdermott@hanoverarea.net

Defendant No. 3

Name Commonwealth of Pennsylvania City Of Luzerne County
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code Pennsylvania, 18
 Telephone Number
 E-mail Address (if known)

Defendant No. 4

Name Pennsylvania Department of H. Services (DHS)
 Job or Title (if known) Commonwealth Tower, Floor 4
 Street Address P.O. Box 2675
 City and County Harrisburg, Pennsylvania 17105-2675
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Commonwealth of Pennsylvania Bureau of Child and Family Services

Bureau of Child and Family Services

333 Market Street 8th Floor

Harrisburg

Pennsylvania 17126-0333

ra-stateboardofed@pa.gov

Defendant No. 2

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Pennsylvania Office of Children, Youth, and Family Serv.

Office of Children, Youth, and Families

Scranton State Office Building 100 Lackawanna Avenue

Scranton Luzerne

Pennsylvania 18503

570-963-4376

Defendant No. 3

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Chanel Buckner

63 Barnes Street

Ashley, Luzerne

Pennsylvania, 18706

570-825-1695

nelb2201@gmail.com

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Cencora

Lash Group

P.O. Box 589

Claysburg

Pennsylvania, 16625-0589

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Family Educational Rights and Privacy Act
FERPA, 4th, 5th 14th Amendment, 20 U.S. Code § 1232g, UCCJEA subsection 208, PKPA

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Shatasha Chanel Richner, is a citizen of the
 State of (name) New York.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
 under the laws of the State of (name) _____,
 and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) Pennsylvania Dept. of Education, is a citizen of
 the State of (name) Pennsylvania. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Pennsylvania Department of Education, is incorporated under the laws of the State of (name) Pennsylvania, and has its principal place of business in the State of (name) Pennsylvania.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On 2/6/23 Defendants Chanel Buckner "CB" and Russell King "R.K." abducted my children with the intent to interfere with my parental rights, inflict severe harm, retaliation malicious intent for self interest. My children were then transported by Defendants C.B. and R.K. from New York to Pennsylvania leading up to additional harm caused by Commonwealth of Pennsylvania Luzerne Family Court, Ashley Police failed to verify validity of orders without being served leading up to addition harm and damage, gross negligence, fraud, identity theft, inflicted by Defendant Department of Education, Pennsylvania Bureau of and Family Services, Hanover Area School District who were contacted on 2/21/23 between 6/26/23 in addition to written notice yet failing to act on serious matters.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pennsylvania Dept. of Education, Bureau of Family Services, DHS, Cencora failed to take action and assist with the ongoing parental/family abduction of my children for the last 18 months, since February 2023 grossly negligent in willful neglect, reckless discretion, child neglect, discrimination. This continues to an extreme risk with no intervention from the court. Currently seeking relief for my children's immediate return including, damages caused by named Defendants for emotional, psychological damage, financial loss, further relief of 18,200,000 in punitive, general, and permanent damages.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/08/2024

Signature of Plaintiff

Printed Name of Plaintiff

Shatara Burton

B. For Attorneys

Date of signing: 08/07/2024

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

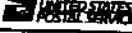




E-mail Address

Shafasia Barker
ACP 5826 P.O. Box 1110
Albany, New York 12201

RECEIVED
HARRISBURG, PA

SEP 14 2024

PER JIA
DEPUTY CLERK

 Retail	
	US POSTAGE PAID
	\$6.13 <small>Origin: 11238 09/30/24 3561840346-4</small>
USPS MEDIA MAIL®	
<small>2 Lb 0.80 Oz RDC 01</small>	
<small>SHIP TO:</small>	<small>C028</small>
	1501 N 6TH ST HARRISBURG PA 17102-1104
USPS TRACKING® 2	
	
<small>9546 0140 0000 4843 5741 70</small>	
	

United States District Court - MDP
1501 N. 6th, Suite 101
Harrisburg, Pennsylvania 17102